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February 10, 2023

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**BY ECF**

The Hon. Ronnie Abrams  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***Abrahall v. Open Source Matters, Inc., No. 1:22-cv-04086-RA***

Dear Judge Abrams:

We represent the defendant in this matter, Open Source Matters, Inc. (“OSM”). On behalf of both parties, OSM and *pro se* plaintiff Rowan Hoskyns Abrahall, we respectfully submit this letter-motion requesting a 30-day adjournment of the initial status conference scheduled for February 17, 2023.

This is the second request for an adjournment of the initial conference. The initial status conference was first scheduled for November 22, 2022. (ECF No. 17). The parties requested an adjournment because Plaintiff had asked for an extension of time to file an amended complaint and OSM requested additional time to file a response to the amended complaint. (ECF No. 23). The Court granted the request and rescheduled the initial conference for February 17, 2023. The parties were also required to file a proposed case management plan and joint letter pursuant to the Court’s first Order and Notice of Initial Conference one week in advance of the rescheduled conference. (ECF Nos. 17, 23, 24).

The parties now request a second adjournment because this morning, Plaintiff sent the undersigned counsel an email stating that she intends to move to voluntarily dismiss the action with prejudice because she lacks the capacity to prosecute the complaint as a *pro se* litigant. The undersigned had previously asked Plaintiff for a call to confer on the case management plan and joint letter, and prepared drafts of those documents, but had not yet received Plaintiff’s feedback on a proposed schedule or Plaintiff’s additions to the joint letter. OSM needs additional time to consider Plaintiff’s intent to move to dismiss this action with prejudice in light of the fact that it has pending counterclaims. Plaintiff consents to this request for an adjournment.



February 10, 2023  
Page 2

To the extent the Court is not inclined to adjourn the upcoming conference, a proposed case management plan is attached as **Exhibit A**. This document reflects OSM's views only.

Application granted. The initial status conference is hereby adjourned to March 24, 2023 at 4:30 p.m., at the same call-in number listed in the Court's prior order.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Hon. Ronnie Abrams  
February 13, 2023

Respectfully submitted,

VENABLE LLP

By: /s/ Kan M. Nawaday

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